

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

J.L.E. v. Commissioner of Social Security

Civil No. 24-10096 (RMB) (D.N.J. Jan. 23, 2026) · No. Civil No. 24-10096 (RMB) · Decided January 23, 2026

SUMMARY

The United States District Court for the District of New Jersey reviews J.L.E.’s appeal from the Commissioner of Social Security’s denial of Supplemental Security Income benefits. The court holds that the Administrative Law Judge adequately explained the residual functional capacity limitations addressing the claimant’s mental impairments and properly evaluated the claimant’s cataract and ability to perform other work. The court therefore affirms the ALJ’s decision.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Renée Marie Bumb
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 23, 2026
DOCKET	Civil No. 24-10096 (RMB)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for Supplemental Security Income benefits.
STANDARD OF REVIEW	The court upheld the ALJ's factual findings if supported by substantial evidence and reviewed legal issues plenary. Substantial evidence means more than a mere scintilla and such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	unknown
PARTIES	J.L.E. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

- Social Security
- administrative law
- disability benefits
- judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately accounted in the RFC for Plaintiff's moderate limitation in concentrating, persisting, or maintaining pace.
2. Whether the ALJ adequately accounted for Plaintiff's mild limitation in adapting or managing oneself and properly considered a consultative examiner's opinion that Plaintiff would have mild to moderate difficulty adapting to normal home and work stressors.
3. Whether the ALJ improperly failed to include additional visual restrictions or resolve an alleged conflict between Plaintiff's cataract-related limitations and the representative occupations identified by the vocational expert.

HOLDINGS

1. The ALJ's limitation to simple, routine, and repetitive tasks adequately addressed Plaintiff's moderate limitation because the ALJ provided a valid explanation supported by the record.
2. The ALJ was required to consider Plaintiff's mild limitation in adapting or managing oneself, but adequately accounted for the limitation through the RFC's simple-task and contact restrictions and the ALJ's evaluation of the mental-health evidence.
3. The ALJ did not reversibly err in crediting Dr. Ray's opinion regarding mild to moderate difficulty adapting to stressors while adopting the RFC's simple-task and contact limitations.
4. The ALJ properly considered the objective evidence concerning Plaintiff's cataract, adopted environmental and driving restrictions, and did not need to apply SSR 96-9p because Plaintiff was limited to light work rather than sedentary work. The RFC and vocational-expert hypothetical were not shown to be inconsistent.

KEY QUOTATIONS

“This Court’s review of the legal issues is plenary.” (at 3)

“as long as the ALJ offers a ‘valid explanation,’ a ‘simple tasks’ limitation is permitted after a finding that a claimant has ‘moderate’ difficulties in ‘concentration, persistence, or pace.’” (at 7)

“Courts in this circuit have ‘consistently held that even mild limitations in the relevant domains of mental functioning must be included in an RFC assessment and hypothetical question posed to the VE that the ALJ relies upon.’” (at 10)

“This Court is not tasked with reweighing the evidence in Plaintiff’s favor; that lies within the original purview of the ALJ.” (at 15)

FACTUAL BACKGROUND

J.L.E. applied for SSI at age forty-seven, alleging disability beginning March 1, 2017, based on physical and mental impairments including cataract, COPD, diabetes, diabetic neuropathy, obesity, and anxiety disorder. The ALJ found several impairments severe but determined that they did not meet or equal a listed impairment. The ALJ assessed an RFC for light work with environmental, driving, task-complexity, and interpersonal-contact

restrictions, and found that Plaintiff could perform representative jobs including garment sorter, dispatcher-router, and warehouse checker.

PROCEDURAL HISTORY

Plaintiff applied for SSI benefits on March 16, 2021. The application was denied initially and on reconsideration. After a September 27, 2023 hearing, the ALJ found Plaintiff not disabled on November 29, 2023, and the Appeals Council denied review on December 15, 2023, making the ALJ's decision final. The district court affirmed.

DISPOSITION

affirmed

CASES CITED

- Knepp v. Apfel, 204 F.3d 78, 83 (3d Cir. 2000)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Plummer v. Apfel, 186 F.3d 422, 427 (3d Cir. 1999)
- Friedberg v. Schweiker, 721 F.2d 445, 447 (3d Cir. 1983)
- Sykes v. Apfel, 228 F.3d 259, 262 (3d Cir. 2000)
- Schaudeck v. Commissioner of Social Security, 181 F.3d 429, 431 (3d Cir. 1999)
- Podedworny v. Harris, 745 F.2d 210, 218 (3d Cir. 1984)
- Hess v. Commissioner of Social Security, 931 F.3d 198, 211 (3d Cir. 2019)
- Ramirez v. Barnhart, 372 F.3d 546 (3d Cir. 2004)
- Stacey S. v. Commissioner of Social Security, No. 1:21-CV-20433-NLH, 2022 WL 16834673, at *5-*7 (D.N.J. Nov. 8, 2022)
- Phillips v. Barnhart, 91 F. App'x 775, 782 (3d Cir. 2004)
- Scott R. v. Kijakazi, 643 F. Supp. 3d 483, 495 (D.N.J. 2022)
- Hur v. Barnhart, 94 F. App'x 130, 133 (3d Cir. 2004)
- Lorie H. v. Commissioner of Social Security, No. 1:20-CV-13192-NLH, 2022 WL 2803168, at *6 (D.N.J. July 18, 2022)
- Lesko v. Commissioner, Social Security Administration, No. 2:24-CV-01660-CBB, 2025 WL 3677017, at *7 (W.D. Pa. Dec. 18, 2025)
- J.M. v. Commissioner of Social Security, No. CV 24-8438 (ZNQ), 2025 WL 3312259, at *7-*8 (D.N.J. Nov. 28, 2025)
- Dionisio R. v. Commissioner of Social Security, No. CV 23-22067, 2025 WL 428557, at *4 (D.N.J. Feb. 7, 2025)
- Ramos v. Commissioner of Social Security, No. CV 18-14155 (KM), 2019 WL 7288889, at *9 (D.N.J. Dec. 30, 2019)

- Daniel M. v. Commissioner of Social Security, No. 21-10533, 2022 WL 2952912, at *4-*5 (D.N.J. July 26, 2022)
- Vargas v. Acting Commissioner of Social Security, No. 21-19077, 2022 WL 17887225, at *5 (D.N.J. Dec. 23, 2022)
- Chandler v. Commissioner of Social Security, 667 F.3d 356, 359 (3d Cir. 2011)
- Virden v. Astrue, No. Civ 11-3926 RBK, 2012 WL 3018254, at *11 (D.N.J. July 24, 2012)
- Edwin J. v. Commissioner of Social Security, No. CV 24-9362 (RK), 2025 WL 2506278, at *7 n.10 (D.N.J. Sept. 2, 2025)
- Barker v. Colvin, No. 1:15-CV-574, 2016 WL 4408997, at *9 (M.D. Pa. July 27, 2016)
- Jones v. Barnhart, 364 F.3d 501, 503 (3d Cir. 2004)
- Michelle S. v. Commissioner of Social Security, No. CV 24-9721 (GC), 2025 WL 2717806, at *5 (D.N.J. Sept. 24, 2025)